

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

STATE OF TEXAS,
STATE OF MISSOURI,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR.,
in his official capacity as
President of the United States, *et al.*,

Defendants.

Civil Action No. 2:21-cv-00067-Z

**UNOPPOSED MOTION FOR SEVEN-DAY EXTENSION FOR
DEFENDANTS' REPLY IN SUPPORT OF MOTION TO RECONSIDER**

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Acting Assistant Attorney General

WILLIAM C. PEACHEY
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EREZ REUVENI
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Defendants move for a seven-day extension of their deadline to submit a reply in support of their Motion to Reconsider Ruling on Plaintiffs' Motion to Enforce Injunction, and Motion for Administrative Stay, ECF No. 118, and respectfully request that the Court extend the deadline for that reply until January 12, 2022.

Good cause exists for an extension. Plaintiffs filed their response to the motion on December 22, 2021. Under Local Rule 7.1(f), Defendants' reply is currently due on January 5, 2022. However, undersigned counsel is currently out on pre-scheduled end-of-year leave for the holidays and will be on leave this entire week, as will Defendants' entire trial team and many of our clients. Defendants request this brief extension in order to accommodate this prescheduled leave. Plaintiffs have stated that they consent to this extension.

Accordingly, Defendants respectfully request that the Court grant this unopposed motion and extend the deadline for Defendants' reply in support of the motion to reconsider until January 12, 2022.

Date: December 28, 2021

Respectfully submitted,

BRIAN M. BOYNTON
Acting Assistant Attorney General

WILLIAM C. PEACHEY
Director
Office of Immigration Litigation
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CERTIFICATE OF CONFERENCE

I certify that I conferred with Plaintiffs' counsel on December 27, 2021, on this motion. Plaintiffs consent to a seven-day extension of Defendants' deadline.

/s/ Brian C. Ward
BRIAN C. WARD
United States Department of Justice

CERTIFICATE OF SERVICE

I certify that on December 28, 2021, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the Northern District of Texas by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

/s/ Brian C. Ward
BRIAN C. WARD
United States Department of Justice